

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:	Chapter 13
SHIRLEY DEAN TAYLOR, Debtor.	Case No. 17-30142-KRH
SHIRLEY DEAN TAYLOR, Plaintiff, v. Allied Title Lending LLC D/B/A Allied Cash Advance; Cerastes, LLC, Defendants.	Adversary Proceeding #: 18-03003-KRH

NOTICE OF MOTION

PLEASE TAKE NOTICE that Cerastes, LLC (“Cerastes”) has filed a Motion (1) to Dismiss the Complaint or (2) In the Alternative to Stay the Adversary Proceeding Pending Resolution of a State Court Lawsuit (“Motion”).

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to grant the relief requested in the Motion, or if you want the Court to consider your views on the Motion, then within 14 days of service of this notice, you or your attorney must:

- ☒ File with the Court, either electronically or at the address shown below, a written response pursuant to Local Bankruptcy Rule 9013-1(H) within 14 days of the

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Attorneys for Cerastes, LLC
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service of this notice. If you mail your response to the Court for filing, you must mail it early enough so the Court will receive it on or before the date stated above:

Clerk of the Court
United States Bankruptcy Court
701 East Broad Street
Suite 4000
Richmond, VA 23219

You must also mail or e-mail a copy to:

Daniel Ross
Weinstein & Riley, P.S.
Attorneys for Cerastes, LLC
2001 Western Avenue, Suite 400
Seattle, WA 98121
Email: DanielR@w-legal.com

- ☒ Attend a hearing to be scheduled at a later date. You will receive separate notice of hearing. **If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing**

PLEASE TAKE FURTHER NOTICE If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Dated: March 2, 2018

/s/ Daniel Ross

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CERTIFICATE OF SERVICE

I hereby certify that on March 2, 2018, a true and accurate copy of the foregoing Notice of Motion was served via First Class U.S. Mail (postage prepaid), via email and/or via the Electronic Case Filing (ECF) system on the following:

Counsel for Plaintiff via ECF Filing:

Emily Connor Kennedy
Mark C. Leffler
Email: ecf@bolemanlaw.com

Counsel for Plaintiff via First-Class Mail:

Dale W. Pittman
The Law Office of Dale W. Pittman, P.C.
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Counsel for Plaintiff via First-Class Mail:

Thomas D. Domonoske
Elizabeth W. Hanes
Consumer Litigation Associates, P.C.
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Counsel for Allied Title Lending LLC D/B/A Allied Cash Advance via ECF Filing:

William Daniel Prince, IV
Email: wprince@t-mlaw.com

Chapter 13 Trustee via First-Class Mail:

Carl M. Bates
P. O. Box 1819
Richmond, VA 23218

Counsel for Chapter 13 Trustee via First-Class Mail:

Susan Hope Call
Chapter 13 Trustee's Office
919 East Main Street, Ste. 1601
P.O. Box 1819
Richmond, VA 23218

Dated: March 2, 2018

/s/ Nikole Montufar
Nikole Montufar
Legal Assistant to Daniel Ross